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February 13, 2026

**VIA ELECTRONIC FILING**

Honorable Peggy Kuo U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

***Re: Trustees of the Plumbers Local Union No. 1 Welfare Fund,  
et al. v. Spray in Place Solutions, LLC, et al. 24 CV 2568 (KAM) (PK)***  
**Joint Letter Motion to the Court Requesting Extension of Current Deadlines**

Dear Judge Kuo:

This firm represents Plaintiffs in the above-referenced matter. We write jointly with the counsel for Defendants Spray in Place Solutions, LLC (“SIPS”) and Atlantic Specialty Insurance Company (“ASIC,” together with SIPS, the “Defendants”) in accordance with Rule IV of your Honor’s Individual Practice Rules to respectfully request an extension of time to complete discovery. The current deadline to complete discovery is March 2, 2026. *See* ECF Minute Entry and Order dated October 29, 2025.

The parties remain committed to resolving this litigation amicably and efficiently. Accordingly, the Plaintiffs are focused on receiving the information needed to evaluate Defendants’ arguments that rebut the audit findings and this extension of deadlines would allow sufficient time for receipt, review and analysis of such documentation, and to conduct any depositions necessary based on the documentation or lack thereof, if necessary. This extension of time would also allow for meaningful settlement discussions that the parties have largely been unable to have to date without the necessary information to do so. In addition, Defendants’ counsel is currently engaged to conduct a show cause hearing in the matter of IME WatchDog, Inc. v. Gelardi, et al.; Case No.: 1:22-cv-1032 (PKC) (JRC) before the Hon. Pamela K. Chen, U.S.D.J. which will take significant preparation time, with a deposition the following day in Superb Motors Inc. et al. v. Deo, et al.; Case No.: 1:23-cv-6188 (JMW). The parties therefore respectfully submit that good cause exists for a ninety (90) day extension of the discovery deadline, through June 1, 2026. This is the parties’ first request for an extension of these discovery deadlines as set forth in the parties’ October 14, 2025 Joint Proposed Discovery Plan as Ordered by the Court on October 1, 2025.

The other deadlines impacted by this extension are the following: i) the joint status report certifying the close of discovery due to the Court on March 6, 2026, and ii) the date by which the parties must take the first step in dispositive motion practice, currently March 31, 2026. The parties respectfully request that each of these deadlines be extended ninety (90) days as well to June 4, 2026 and June 29, 2026, respectively. A revised Proposed Discovery Plan/Scheduling Order is attached.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Rebecca W. Richardson

Rebecca W. Richardson, Esq.

*Counsel for the Plaintiffs*

/s/ Emanuel Kataev

Emanuel Kataev, Esq.

*Counsel for the Defendants*